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Approved:

SARAH MORTAZAV

Assistant United States

AUG S 0 2018

Before:

THE HONORABLE BARBARA MOSES

United States Magistrate Judge

Southern District of New York

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UNITED STATES OF AMERICA

COMPLAINT

- v. -

Violation of

18 U.S.C. §§ 2113(a), 2

TAMIKA L. JACKSON,

: and 924(c)(1)(A)(ii)

Defendant.

COUNTY OF OFFENSE:

NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

KERRY C. CALNAN, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE (Attempted Bank Robbery)

On or about August 30, 2018, in the Southern District of New York, TAMIKA L. JACKSON, the defendant, knowingly, by force and violence, and by intimidation, did take, and attempt to take, from the person and presence of another, property and money and other things of value belonging to, and in the care, custody, control, management, and possession of a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation ("FDIC"), to wit, JACKSON attempted to obtain money from a bank in Manhattan, by brandishing a firearm and demanding that a bank employee turn over to JACKSON money in the bank's custody.

(Title 18, United States Code, Sections 2113(a) and 2.)

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COUNT TWO

(Firearms Use, Carrying, and Possession)

2. On or about August 30, 2018, in the Southern District of New York, TAMIKA L. JACKSON, the defendant, during and in relation to a crime of violence for which she may be prosecuted in a court of the United States, namely, the bank robbery charged in Count One of this Complaint, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm which was brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

3. I am a Special Agent with the FBI and I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with other law enforcement agents, witnesses and others, as well as my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

The Bank Robbery

- 4. Based on my personal observations, conversations with other law enforcement officers, my interviews of witnesses, and my review of law enforcement reports, I have learned, in substance and in part, the following:
- a. On or about August 30, 2018, at or about 10:20 AM, TAMIKA L. JACKSON, the defendant, entered a bank ("Bank-1") at 1293 Broadway in Manhattan, on 6th Avenue between W 33rd and W 34th Streets, New York, New York. From my discussion with a Bank-1 bank teller (the "Teller") and my review of Bank-1 security camera footage, I have learned that JACKSON approached the Teller, took a firearm out of her bag and displayed it to the Teller, passed the Teller a deposit slip that had the number "50 million" written on the back, and said, in substance and in

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part, "Give me the money." JACKSON also banged the gun against the teller window.

- b. The Teller hit an alarm to alert law enforcement to the robbery. The Teller then went into a back room behind the teller station. When the Teller returned, she did not see JACKSON at the teller window. From my conversations with law enforcement who spoke with a Bank-1 security guard (the "Security Guard"), I have learned that JACKSON left Bank-1 and headed eastbound on 33rd Street
- c. Two officers ("PO-1" and "PO-2") arrived at the scene at approximately 10:30 AM. The Security Guard described JACKSON to PO-1 and PO-2 as a short, African-American female with white tank top and black pants, who had fled eastbound on 33rd Street.
- d. The Security Guard, PO-1, and PO-2 went eastbound on 33rd Street. At or about 41 West 33rd Street the Security Guard identified a short, African-American female wearing a white tank top and black pants and carrying a bag walking eastbound ("Individual-1") as the person who had committed the robbery.
- e. PO-1 apprehended Individual-1 and handcuffed her. PO-2 opened the bag Individual-1 was carrying and found a firearm within it. At that time, Individual-1 stated, "It wasn't me, I didn't do anything."
- f. Based upon my personal observations of Individual-1 and my review of still images from the Bank-1 security camera footage, I believe that Individual-1 is TAMIKA L. JACKSON, the defendant.

Federal Deposit Insurance Corporation

5. From my review of publicly available materials, as well as my training and experience, I know that, at all relevant times, the deposits of Bank-1 were insured by the FDIC.

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WHEREFORE, deponent respectfully requests that TAMIKA L. JACKSON, the defendant, be imprisoned or bailed, as the case may be.

> IAL AGENT KERRY C. CALNAN Federal Bureau of Investigation

other to before me this

day of August, 2018

THE HONORABLE BARA MOSES

UNITED STATES MAGISTRATE JUDGE and Signal Symbol Southern District of New York M & 14, 2018

Gabriei W. Gorenstein United States Magistrate Judge Southern District of New York